

From: [Marcy Norwood Lynch](#)
To: [Patrick Madden](#); [Michael Dell'Angelo](#); [John Cove](#); [Suzanne Jaffe Nero](#); [Kevin Rayhill](#)
Cc: [jcw@campbellandwilliams.com](#); [Perry Grossman](#); [Eric Cramer](#); [Brown, Ben](#); [Richard A. Koffman](#); [Hafiz, Hiba](#); [Joseph Saveri](#); [Kevin Rayhill](#); [Matthew Weiler](#); [Jerome Elwell \(jelwell@WarnerAngle.com\)](#); [Robert C. Maysey \(rmaysey@WarnerAngle.com\)](#); [DSpringmeyer@wrslawyers.com](#)
Subject: RE: JSR Chart
Date: Friday, April 29, 2016 8:50:11 AM

Michael and Patrick,

I don't believe we settled on a time for the final exchange for drafts this morning. We propose 10:30 a.m. PT.

Also, please note that, pursuant to Section 11 of the Protective Order, we are clawing back sample document MMERSCH00066967 because it is an inadvertently produced document that is protected from disclosure under the attorney-client privilege. Pursuant to the Protective Order, this document shall not be used "for any purpose until further order of the Court." Please confirm that you will remove this document from your exhibits and remove references of this document from your section of the JSR.

Regards,
Marcy

From: Patrick Madden [mailto:pmadden@bm.net]
Sent: Thursday, April 28, 2016 8:08 PM
To: Michael Dell'Angelo; John Cove; Suzanne Jaffe Nero; krayhill@saverilawfirm.com
Cc: jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman; Eric Cramer; Brown, Ben; Richard A. Koffman; Hafiz, Hiba; jsaveri@saverilawfirm.com; krayhill@saverilawfirm.com; Matthew Weiler (MWeiler@saverilawfirm.com); Jerome Elwell (jelwell@WarnerAngle.com); Robert C. Maysey (rmaysey@WarnerAngle.com); DSpringmeyer@wrslawyers.com
Subject: RE: JSR Chart

Counsel –

Attached are 15 exhibits referenced in Plaintiffs' sections of the JSR.

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From: Michael Dell'Angelo
Sent: Thursday, April 28, 2016 11:07 PM
To: John Cove; Suzanne Jaffe Nero; Patrick Madden; krayhill@saverilawfirm.com
Cc: jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman; Eric Cramer; Brown, Ben; Richard A. Koffman; Hafiz, Hiba; jsaveri@saverilawfirm.com; krayhill@saverilawfirm.com; Matthew Weiler (MWeiler@saverilawfirm.com); Jerome Elwell (jelwell@WarnerAngle.com); Robert C. Maysey (rmaysey@WarnerAngle.com); DSpringmeyer@wrslawyers.com
Subject: RE: JSR Chart

John:

Attached is Plaintiffs' draft section of the JSR. As discussed today, Patrick will circulate proposed exhibits. Please circulate Defendant's draft.

Regards,

Michael

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From: Michael Dell'Angelo
Sent: Thursday, April 28, 2016 9:21 PM
To: John Cove; Suzanne Jaffe Nero; Patrick Madden; krayhill@saverilawfirm.com
Cc: jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman
Subject: RE: JSR Chart

We will hard stop by 8:00 pm Pacific and send it earlier, if possible.

Michael Dell'Angelo

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From: John Cove [<mailto:jcove@BSFLLP.com>]
Sent: Thursday, April 28, 2016 9:13 PM
To: Michael Dell'Angelo; Suzanne Jaffe Nero; Patrick Madden; krayhill@saverilawfirm.com
Cc: jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman
Subject: RE: JSR Chart

Michael,

When do you expect to have your draft section of the JSR ready to exchange?

From: Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]
Sent: Thursday, April 28, 2016 5:42 PM
To: Suzanne Jaffe Nero; Patrick Madden; krayhill@saverilawfirm.com
Cc: John Cove; jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman
Subject: RE: JSR Chart

Suzanne:

Attached is Mr. Kellner's draft declaration. As discussed during the meet and confer today, we still need to review Mr. Kellner's declaration carefully. Also, we provided Mr. Kellner with the JSR chart and he is continuing to review and analyze the information. As we review with Mr. Kellner, he may have additional changes to his declaration. Plaintiffs reserve all rights.

Regards,

Michael

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From: Suzanne Jaffe Nero [<mailto:snero@BSFLLP.com>]
Sent: Thursday, April 28, 2016 5:11 PM
To: Michael Dell'Angelo; Patrick Madden; krayhill@saverilawfirm.com
Cc: John Cove; jcw@campbellandwilliams.com; Marcy Norwood Lynch; Perry Grossman
Subject: JSR Chart

Michael,

As we discussed on the call, here is the updated chart for use in the Joint Status Report. We believe that the chart is easier to read when it is confined to just email document numbers as opposed to the many other categories of documents (both electronic and not) at issue. We have revised the chart accordingly. As we discussed on the call, please feel free to give us a call if you have questions about the numbers.

Also, to spare your whole team's inboxes of iterative drafts, I've just included a smaller set of Plaintiffs' counsel on this email chain. I trust that you can forward this along to anyone else who is working on the JSR and needs this information.

Thanks,
Suzanne

Suzanne Jaffe Nero

Associate

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